

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON AT SEATTLE**

ROMELIA PEREZ,

Plaintiff,

v.

AMERICAN FAMILY INSURANCE  
COMPANY,

Defendant.

Case No. 2:20-cv-00849 RSM

**STIPULATION TO CONTINUE THE  
DEADLINE TO AMEND PLEADINGS**

**Noted for: August 19, 2020**

**STIPULATION**

The parties to this action, by and through the undersigned counsel, hereby stipulate that the current August 27, 2020, deadline for amending pleadings be continued to October 31, 2020. A continuance is warranted due to outstanding discovery issues, and to afford the parties time to engage in meaningful ADR.

The parties agree that there is good cause to continue the deadline for amending pleadings in this matter. A continuance will not prejudice either party's case at trial, but failure to grant a continuance will substantially prejudice the parties as it may adversely affect the likelihood of early resolution. The parties agree that the Court should continue deadline for amending pleadings to October 31, 2020 pursuant to this stipulation.

///

///

STIPULATION AND ORDER TO CONTINUE THE DEADLINE TO AMEND  
PLEADINGS

1 DATED this 19<sup>th</sup> day of August, 2020.

2 RUIZ & SMART PLAINTIFF LITIGATION

COLE | WATHEN | LEID | HALL PC

3 s/ Kathryn Knudsen (per email authorization)

s/Christopher J. Roslaniec

4 Isaac Ruiz, WSBA #35237

Rory W. Leid, WSBA No. 25075

Kathryn Knudsen, WSBA #41075

Christopher J. Roslaniec, WSBA #40568

5 *Attorneys for Plaintiffs*

*Attorneys for Defendant*

95 S Jackson St Ste 100

1505 Westlake Avenue North, Suite 700

Seattle, WA 98104

Seattle, WA 98109-6243

T: (206) 203-9100

T: (206) 622-0494

7 [iruiz@plaintiffllit.com](mailto:iruiz@plaintiffllit.com)

[rleid@cwlhlaw.com](mailto:rleid@cwlhlaw.com)

[kknudsen@plaintiffllit.com](mailto:kknudsen@plaintiffllit.com)

[croslaniec@cwlhlaw.com](mailto:croslaniec@cwlhlaw.com)

8 **ORDER**

9 **IT IS HEREBY ORDERED** that current August 27, 2020, deadline for amending  
10 pleadings be continued to November 2, 2020.

11 Dated this 26<sup>th</sup> day of August, 2020.

12  
13 

14 RICARDO S. MARTINEZ

15 CHIEF UNITED STATES DISTRICT JUDGE